

The Hon Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

LLOYD C. HILL, JR., a single man,

Plaintiff,

vs.

KING COUNTY, a Washington municipal corporation; C. MOREY, and the marital community comprised of C. MOREY and DOE MOREY; M. CHASE and the marital community comprised of M. CHASE and DOE CHASE; R. ALMANZA, and the marital community comprised of R. ALMANZA and DOE ALMANZA; D. FOLK and the marital community comprised of D. FOLK and DOE FOLK; M. WILLIAMSON and the marital community comprised of M. WILLIAMSON and DOE WILLIAMSON; DOE(1) JEFFERSON and the marital community comprised of DOE(1) JEFFERSON and DOE(2) JEFFERSON; DOE(1) MAHYER and the marital community comprised of DOE(2) JEFFERSON; DOE(1) REYES and the marital community comprised of DOE(1) REYES and DOE(2) REYES; and unknown DOES 1-10, and their marital communities,

Defendants.

CASE NO. 2:23-cv-00771-RSM

STIPULATED MOTION FOR ORDER
CONTINUING TRIAL DATE AND
CASE DEADLINES

NOTED FOR CONSIDERATION:
May 17, 2024

STIPULATED MOTION FOR ORDER
CONTINUING TRIAL DATE
AND CASE DEADLINES - 1
(CASE NO. 2:23-cv-00771-RSM)

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I. RELIEF REQUESTED

Pursuant to LCR 7(d)(1) and 10(g), Plaintiffs and Defendants hereby submit this stipulated motion for entry of an order continuing all case deadlines and the trial date. In support of this motion, the parties jointly submit the following to the Court:

1. On July 11, 2023, the Court entered the Order Setting Trial Date and Related Dates. Dkt. #10. Under the case scheduling Order, the deadline for disclosure of expert testimony is June 12, 2024; the deadline for filing motions related to discovery is July 12, 2024; and the discovery completion date is August 12, 2024. *Ibid.*

2. In this case, Plaintiff seeks recovery of money damages for an alleged incident that occurred at the King County Jail on December 24, 2020, which Plaintiff alleges resulted in serious personal injuries. Several King County corrections officers who were involved in the alleged incident are defendants in this action.

3. The parties have diligently and cooperatively participated in the discovery process. Both sides have propounded extensive written discovery and have produced voluminous documents in response to requests for production of documents. The process of obtaining and producing documents in response to requests for production was delayed due to the volume of responsive documents and the confidential nature of some of the requested documents. In addition, Plaintiffs timely requested an inspection of the King County Jail premises, which presents difficult issues related to access and safety of the participants of the proposed inspection. The parties are continuing to work cooperatively to facilitate an inspection of the Jail that will permit Plaintiff's experts to form opinions necessary for Plaintiff's claims, and to permit Plaintiff to properly and adequately pursue and present his claims.

4. Additionally, due to a shift in case assignments in the office of Defendants'

counsel, present counsel for Defendants substituted as new counsel for Defendants several months after the case commenced, requiring present counsel to spend time familiarizing herself with the case and causing a suspension of proceedings in the case during that time.

5. Depositions of the parties and their witnesses, including expert witnesses, have not occurred due to the difficulty the parties have encountered in obtaining relevant documents in discovery and in reaching a resolution of the issues related to Plaintiff's request for inspection of the Jail premises.

6. Without an extension of the case deadlines, including without limitation the expert witness disclosure deadline, discovery motion deadline, and discovery deadline, it is extremely unlikely the parties will be able to timely complete all necessary discovery. The parties submit that a six-month extension of all case deadlines and the trial date will permit them to resolve any remaining discovery issues and to properly prepare the case for trial.

7. Wherefore, the parties jointly move and stipulate that the case deadlines and trial date should be extended as follows:

<u>Event</u>	<u>Current deadline</u>	<u>New deadline</u>
JURY TRIAL DATE	December 9, 2024	June 9, 2025
Disclosure of expert testimony under FRCP 26(a)(2)	June 12, 2024	December 13, 2024
Deadline for filing motions related to discovery. Any such motions shall be noted for consideration pursuant to LCR 7(d)(3)	July 12, 2024	January 13, 2025
Discovery completed by	August 12, 2024	February 12, 2025
All dispositive motions must be filed by and noted on the motion calendar pursuant to LCR 7(d)	September 10, 2024	March 10, 2025

1	Mediation per LCR 39.1(c)(3), if requested		
2	by the parties, held no later than	October 25, 2024	April 25, 2025
3	All motions in limine must be filed by	November 12, 2024	May 12, 2025
4	Agreed pretrial order due	November 27, 2024	May 27, 2025
5	Trial briefs, proposed voir dire questions,		
6	Jury instructions, neutral statement of		
7	the case, and trial exhibits due	December 4, 2024	June 4, 2025

8 SO STIPULATED on May 16, 2024.

9 *We certify that this motion contains 621 words, in compliance with the Local Civil Rules.*

10 ***Attorneys for Plaintiff:***

11 BERRY & BECKETT, PLLP

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12 /s/ Guy Beckett

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16 ***Attorneys for Defendants:***

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II. ORDER

The Court having considered the foregoing stipulated motion, and finding that good cause has been shown for the requested relief, now therefore,

It is so ordered.

DATED this 17th day of May, 2024.



RICARDO S. MARTINEZ
UNITED STATES DISTRICT JUDGE